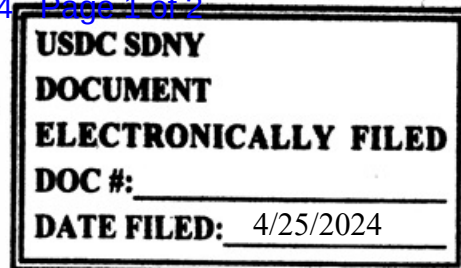


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April 24, 2024

VIA ECF

Hon. Margaret M. Garnett, U.S.D.J.
United States District Court
Southern District of New York
40 Centre Street, Room 906
New York, New York 10007

Re: *Darko v. Graham et al.*, Case No. 1:23-CV-03232 (JMF)

Dear Judge Garnett:

The undersigned counsel represents Plaintiff Michael Elliot Kwabena Okyere Darko (p/k/a Obrafour) in the above captioned matter.

We write pursuant to Rule I(B)(5) of Your Honor's Individual Rules and Practices to respectfully request an extension of time, from April 29, 2024, until May 17, 2024, for Plaintiff to oppose Defendants Aubrey Drake Graham, Bremer Music Group AB, Johannes Klahr, Richard Zastenker, UMG Recordings, Inc., Universal Music Publishing AB, Universal Music Publishing Inc., Universal Songs Of Polygram International Inc., Warner Music Group Corp., Warner-Tamerlane Publishing Corp.'s Motion to Dismiss Plaintiff's First Amended Complaint (ECF 92, 93, 94) and Defendant Diamante Anthony Blackmon's Motion to Dismiss Plaintiff's First Amended Complaint (ECF 96, 97, 98) (collectively "Defendants' Motions to Dismiss"), and to consequently set a new briefing schedule.

This extension is being requested considering several unexpected scheduling conflicts, emergent travel this month, and issues that have arisen unexpectedly on other matters, and in light of Plaintiff having to oppose two motions with supplemental briefing. This is Plaintiff's first request for an extension of time made to Your Honor and following the Court Conference held on March 12, 2024, which set a briefing schedule based on Defendants' request to file supplemental briefing.¹

All Defendants consent to the proposed extension if the briefing schedule is accordingly modified to allow them additional time to file their Reply to Plaintiff's Opposition, to which Plaintiff does not oppose either. Defendants UMG Recordings, Inc., Universal Music Publishing, Inc., Universal

¹ See, related Court Order at ECF 120.

Songs of Polygram International Inc., Universal Music Publishing AB, Bremer Music Group AB, Warner Music Group Corp., Warner-Tamerlane Publishing Corp., Aubrey Drake Graham (p/k/a Drake), Johannes Klahr, and Richard Zastenker (collectively, the “MSK Defendants”) are willing to abide by the current schedule, which their counsel has planned around since the schedule was set during the conference held on March 12, 2024. *See*, ECF 120. However, in the event the Court is inclined to agree to a modified schedule, because of certain professional and personal conflicts (including vacations) scheduled during the last week of May and the first week of June, the MSK Defendants respectfully request that they have until June 14, 2024, to file their reply papers.

The current due date for Plaintiff’s Opposition to Defendants’ Motions to Dismiss and the briefing related to same, as well as the proposed extensions sought by the parties, are as follows:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Plaintiff’s Opposition:	April 29, 2024	May 17, 2024
Defendants’ Reply:	May 15, 2024	June 14, 2024

In light of the foregoing, the undersigned counsel respectfully requests the Court for a reasonable extension to May 17, 2024, to file Plaintiff’s Opposition to Defendants’ Motions to Dismiss and to update the related briefing schedule as newly proposed. We kindly await the Court’s decision and appreciate the Court’s consideration of this matter.

Application GRANTED. It is hereby ORDERED that Plaintiff’s opposition shall be due **May 17, 2024**, and Defendants’ reply shall be due **June 14, 2024**. The Clerk of Court is respectfully directed to terminate Dkt. No. 125.

SO ORDERED. Date: 4/25/2024.


HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE

Respectfully submitted,



Imran H. Ansari, Esq.